

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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AKAMAI TECHNOLOGIES, INC. and  
AKAMAI SECURITIES CORPORATION,

Plaintiffs,

v.

DEUTSCHE BANK AG,

Defendant.

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) Civil Action No:  
) 10-CV-10254-JLT  
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**PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION FOR A PROTECTIVE  
ORDER AND AKAMAI'S CROSS-MOTION TO AMEND ITS LIST OF DEPONENTS  
AND FOR SANCTIONS**

Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation (collectively, "Akamai") hereby submit this Opposition to Defendant's Motion for a Protective Order and Akamai's Cross-Motion to Amend Its List of Deponents, and for Sanctions against Defendant Deutsche Bank AG ("DB AG"). In support of its motion, Akamai submits contemporaneously herewith its Memorandum of Law in Opposition to Defendant's Motion for a Protective Order and in Support of Akamai's Cross-Motion to Amend Its List of Deponents and for Sanctions, and the Affidavit of Jennifer E. Tracy with accompanying exhibits, both of which will be filed under seal.

WHEREFORE, Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation respectfully request that this Court enter an order: (1) denying DB AG's motion for a protective order; (2) compelling DB AG to identify all individuals that likely possess discoverable information relevant to the disputed facts at issue; (3) permitting Akamai to amend its list of

deponents within seven days; and (4) imposing the requested sanctions and any further relief that this Court deems appropriate.

Dated: August 15, 2011

Respectfully submitted,

AKAMAI TECHNOLOGIES, INC. and AKAMAI  
SECURITIES CORPORATION

/s/ Jennifer E. Tracy  
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**CERTIFICATE UNDER LOCAL RULE 7.1(A)(2)**

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel for Akamai Technologies, Inc. and Akamai Securities Corporation hereby certifies that counsel for the Plaintiffs has conferred with counsel for the Defendant concerning the subject matter of this Motion. Defendant does not consent to this Motion.

/s/ Jennifer E. Tracy  
Jennifer E. Tracy

**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 15, 2011.

/s/ Jennifer E. Tracy  
Jennifer E. Tracy